

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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|   |   |                                    |
|---|---|------------------------------------|
| LULA WILLIAMS, <i>et al.</i> ,          | ) |                                    |
|   | ) |                                    |
| Plaintiffs,                             | ) |                                    |
| v.                                      | ) | Civil Action No. 3:17-cv-461 (REP) |
|   | ) |                                    |
| BIG PICTURE LOANS, LLC, <i>et al.</i> , | ) |                                    |
|   | ) |                                    |
| Defendants.                             | ) |                                    |
|   | ) |                                    |

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**JOINT NOTICE AND STIPULATION REGARDING § 1962(c) DAMAGES**

Plaintiffs, on behalf of themselves and the classes certified by this Court, and Defendant Matt Martorello hereby file this Joint Notice in response to the Court's Order dated July 7, 2023 (ECF No. 1373), which requested the parties' position regarding: (1) the calculation of damages for the § 1962(c) claim; and (2) whether those damages are the same as the § 1962(d) claim.

The parties stipulate and agree that the damages amount for the § 1962(c) claim is \$43,401,817.47. The parties further stipulate and agree that the damages for § 1962(c) claim are the same as the damages for the § 1962(d) claim.

Dated: July 10, 2023

Respectfully submitted,

***PLAINTIFFS, on behalf of themselves  
and the classes as certified by the Court***

By: /s/ Kristi C. Kelly  
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